



SOCIAL SECURITY
Office of the General Counsel

June 17, 2024

Richard L. Revesz
Administrator
Office of Information and Regulatory
Affairs
Office of Management and Budget
New Executive Office Building, Room
10201725 17th Street, NW
Washington, DC 20503

Administrator Revesz:

Attached is the 2024 Social Security Administration (SSA) Annual Matching Activity Report for calendar year 2023. SSA prepared the report in accordance with the Privacy Act (5 U.S.C. § 552a(u)(3)(D)) and the Office of Management and Budget Circular No.A-108.

If you require additional information, please let me know. Please direct any staff questions to Neil Etter at (410) 965-8028 or Neil.Etter@ssa.gov.

Sincerely,

A handwritten signature in black ink that reads "Matthew D. Ramsey".

Matthew D. Ramsey
Chair
Data Integrity Board

Attachments

SOCIAL SECURITY ADMINISTRATION
BALTIMORE MD 21235-0001

SOCIAL SECURITY ADMINISTRATION (SSA)
2024 ANNUAL MATCHINGACTIVITY REPORT

Report on Agency Matching Activities
(Authority: 5 U.S.C. 552a(u)(3)(D))

I. Name and Address of Reporting Agency

Social Security Administration (SSA)
6401 Security Boulevard
Baltimore, Maryland 21235-6401

II. Data Integrity Board (DIB) Members

Stephen G. Evangelista – Acting Deputy Commissioner for Retirement and Disability Policy;

Marcela Escobar-Alava - Chief Information Officer;

Michelle A. King - Deputy Commissioner for Operations;

Gail S. Ennis - Inspector General for Social Security;

Chad M. Poist - Deputy Commissioner for Budget, Finance, and Management;

Tom Klouda - Deputy Commissioner for Legislation and Congressional Affairs; and

Matthew D. Ramsey - DIB Chair, Executive Director, Office of Privacy and Disclosure.

III. Counsel to DIB

Nancy Morales Gonzalez –Associate General Counsel for General Law, Office of the General Counsel

IV. Secretary to DIB

Michelle L. Christ
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V. Explanation of Changes in Board Membership or Structure

Due to staffing changes since last year’s report, the agency has the following two new DIB

members:

- (1) Chad Poist replaced Michelle King as Deputy Commissioner for Budget, Finance, and Management;
- (2) Michelle A. King replaced Grace M. Kim as Deputy Commissioner for Operations;
- (3) Marcela Escobar-Alava replaced Patrick Newbold who replaced Sean P. Brune as Chief Information Officer for Office of the Chief Information Officer;

VI. Disapproved Agreements

SSA's DIB did not disapprove any matching agreement during calendar year 2023.

VII. Violations

Match 1051 with the Department of Education that expired October 10, 2023

This agreement provided that ED and SSA would exchange information concerning "applicants," which was a defined term in the agreement to include borrowing student applicants and borrowing parent applicants. ED identified that it included requests for information to SSA concerning individuals beyond the defined scope of "applicants." ED and SSA are working on short and long-term solutions to meet both agencies' needs and have ensured that the reestablished October 11, 2023, agreement accurately covers the exchange.

VIII. Cost-Benefit Requirements

A. Cost-Benefit Analysis (CBA) Ratio

While SSA's DIB ordinarily needs a favorable cost benefit ratio before proceeding with any matching programs, SSA did proceed with three agreements having an unfavorable or unmeasurable cost-benefit analysis as explained below:

- ***Match 1003 with the Department of Labor (Black Lung Part C Benefit Payments):***

Section 224(h)(1) of the Social Security Act, (42 U.S.C. § 424a(h)(1)) mandates any Federal agency to provide SSA with information in its possession that SSA may need for making a timely determination of the amount of reduction required under section 224 of the Act for workers' compensation offset.

Our matching agreements are effective for a two-and-a-half year or 30-month cycle (18-month establishment and 12-month renewal) and the current CBA ratios calculations date back to the 2022 reestablishment. As indicated in our prior year report, the Covid-19 pandemic affected the ratio figures for this earlier time period because SSA temporarily suspended processing and collection of some overpayments and adverse action workloads during it. Consequently, the

agency realized lower savings from retroactive overpayment development and recovery, and adjustment of benefit payment amounts to prevent future improper payments. Moreover, the costs to SSA to perform the matches and development work in the field offices had increased. Despite the temporary net that resulted in a negative CBA ratio of .09 to 1, this matching agreement normally provides favorable CBA ratios and SSA considers it a valuable program integrity tool that mitigates improper payments. We expect a better ratio with the upcoming 2024 agreement reestablishment.

Therefore, SSA's DIB continues to recommend the continuation of this matching program.

- **Match 1038** *with the Bureau of the Fiscal Service, Department of Treasury:*

The benefit to the United States Treasury for this matching operation is the correction of those cases where there is a decrease in the monthly payment amount and the recovery of detected overpayments totaling \$722,011. The overall cost for developing and operating this CBA totals \$842,649. While this matching program currently has a negative CBA ratio of 0.86 to 1, it remains the most efficient and comprehensive method of collecting and comparing information. Also, there is currently no other administrative activity that can effectively provide the information. This ongoing matching program continues to support accurate eligibility determinations that help avoid improper payments.

Therefore, SSA's DIB continues to recommend the continuation of this matching program.

- **Match 1052** *with the Veterans Administration (VA):*

VA is statutorily required to verify income data reported by medical care applicants and SSA provides verified income information reported to medical care applicants to VA at no cost (38 U.S.C. § 5106). Federal law also authorizes SSA to disclose certain tax return information to VA (26 U.S.C. § 6103(1)(7)). While this matching program currently has a negative CBA ratio of .267:1, it remains the most efficient and comprehensive method of collecting and comparing the information because there appears to be no other administrative activity can efficiently accomplish these verifications and disclosures. Also, in the past, this agreement has provided favorable CBA ratio (2.2:1) and could do so again. At the time of this report, it is not clear why it changed to negative.

Therefore, SSA's DIB continues to recommend the continuation of this matching program.

- **Match 1097** *with the Department of Health and Human Services, Centers for Medicare and Medicaid Services (CMS):*

Section 1413 of the Patient Protection and Affordable Care Act (PPACA)

mandates the use of a matching program to provide for the streamlined application process required by Congress. As a result, this ongoing matching program supports accurate eligibility determinations that help avoid improper payments, but similar to the previous year, there is no data available to quantify the number of improper payments avoided. This continues to be a situation where the match results are not currently used to identify or recover past improper payments. As such, there are no estimates (i.e., unmeasurable) of avoided or recovered improper payments in the CBA to offset against the costs. The CBA demonstrated that monetary costs to operate the eight Marketplace matching programs were approximately \$58.9 million, but it does not quantify direct governmental cost saving benefits sufficient to offset the costs because the Marketplace matching programs are not intended to avoid or recover improper payments. The CBA, therefore, does not demonstrate that the matching program is likely to be cost-effective. As long as PPACA is effective as is, we do not foresee any changes to the upcoming 2024 agreement reestablishment.

Therefore, SSA's DIB continues to recommend the continuation of this matching program.

B. Waiver of Cost-Benefit Analysis (CBA)

SSA's DIB granted the following agreements a waiver to the usual cost-benefit analysis requirement pursuant to 5 U.S.C. § 552a(u)(4)(B):

- *Match 1007 with the Railroad Retirement Board (RRB)*

HHS/SSA and RRB DIBs granted this waiver in 1992 when SSA was part of the Department of Health and Human Services. The match assures the effective administration of the two benefit programs. The information SSA provides to RRB is not available from other sources, so a CBA is not a factor in determining whether this exchange occurs.

Therefore, SSA's DIB continues to recommend the continuation of this matching program and waiving the CBA.

- *Matches 6000 and 6003 for State/State Agency Model Agreements for State Data Exchange*

The waiver for these matches began in March 2008 and continues onward into the present. The matches assure the effective administration of state benefit programs. The information SSA provides to state agencies is not available from other sources, so a CBA is not a factor in determining whether this exchange occurs.

Therefore, SSA's DIB continues to recommend the continuation of this matching program and waiving the CBA.

IX. Adherence to Terms

SSA fully adhered to the terms of each matching program in which it participated during calendar year 2023.

X. Justification

All disclosures of SSA records used in matching programs during calendar year 2023 were, and remain, justified.

XI. Links to Matching Notices and Matching Agreements

Find a list of all SSA's active matching programs, along with links to their corresponding matching notices and matching agreements, on SSA's Privacy webpage at <https://www.ssa.gov/privacy/>.

SSA ACTIVE AGREEMENTS DURING CALENDAR YEAR: 2023

<i>Title of Match</i>	<i>Matching Agency</i>	<i>Purpose</i>	<i>Effective Date</i>	<i>Federal Register (FR) Notice</i>	<i>Cost-Benefit Ratio</i>
1003 – Department of Labor (DOL) Black Lung Part C Benefit Payments	DOL	SSA uses DOL Part C Black Lung benefit data to verify disability benefit amounts.	5/25/2022	87 FR 4219	.09 to 1 See Section VIII above.
1004 – Department of Defense (DoD) Military Retirement	Defense Manpower Data Center	SSA uses military retirement and survivor payments to determine eligibility and benefit payment amounts for SSI and SVB.	11/18/2021	86 FR 57726	2.06:1
1005 – Office of Personnel Management (OPM) Consolidated Matches	OPM	SSA uses OPM civil service pension data to verify eligibility and benefit payment amounts of SSA disability and SVB applicants and beneficiaries.	09/11/2021	86 FR 33011	42.17:1.
1006 – Railroad Board (RRB) Combined health Insurance Check Writing (CHICO)	RRB	SSA uses the RRB CHICO information to verify eligibility and benefit payments for SSI and SVB applicants and beneficiaries.	09/02/2023	88 FR 15113	34.4:1
1007 – RRB/SSA Wage and Benefit Match	RRB	The RRB uses data exchanged under this agreement to properly administer section 231f(b)(2)(D) of the Railroad Retirement Act of 1974 (45 U.S.C. § 231f(b)(2)(D)).	3/13/2023	88 FR 8921	See Section VIII above.

<i>Title of Match</i>	<i>Matching Agency</i>	<i>Purpose</i>	<i>Effective Date</i>	<i>Federal Register (FR) Notice</i>	<i>Cost - Benefit Ratio</i>
1008 – Veterans Administration (VA) Adjustment of SSI andSVB Benefits	VA/Veteran s Benefits Admin.	SSA uses VA data to: (1) Identify certain SSI & SVB recipients, who receive VA benefits and (2) identify income limits of certain individuals to determine their potential eligibility for the Medicare Savings Program.	9/15/2023	88 FR 63639	34.3:1
1010 – Department of Homeland Security (DHS) Noncitizens Suspension & Recovery	DHS	SSA uses the information provided by DHS to identify noncitizens ineligible for Supplemental Security Income payments due to their absence or removal from the United States; and to identify noncitizens ineligible for RSDI benefits because of removal from the United States.	5/18/2022	87 FR 0321	3.26:1
1012 – Corporations for National and Community Services (CNCS) Social Security Number Verification	CNCS	SSA verifies SSNs and provides citizenship status to CNCS for individuals applying to serve in approved national service positions.	10/01/2023	88 FR 42343	34.19:1
1015 –DOL Black LungPart B Data	DOL	SSA verifies that recipients of Part B are receiving the correct amount of SSI Payments.	05/25/2022	87 FR 4219	3.06:1

1016 – Internal Revenue Service (IRS) Disclosure of Information to Federal, State, and Local Agencies (DISFLA)	Department of Treasury (DOT)	SSA uses the return information provided by the IRS to verify eligibility, and determine the benefit payment amount for Medicare and SSI.	7/1/2023	88 FR 22079	6.41
1030 – VA Income Dependent Extract	VA	SSA verifies SSNs provided by the VA and provides SSA benefit data. The VA uses the SSA information to verify their benefit payment amounts.	9/12/2022	87 FR 48776	\$47.7 million thru FY 24 *VA did not provide us with the ratio.
1038 – Bureau of the Fiscal Service (Fiscal Service) Savings Bond Match	DOT	SSA uses Fiscal Service’s Savings Security data to determine continued eligibility and/or correct benefit amounts for SSI applicants and recipients who did not report or incorrectly reported ownership of savings securities.	12/26/2023	88 FR 54389	.86:1 See Section VIII above.
1045 – OPM Earnings for Disability	OPM	SSA discloses return information to OPM to verify factors affecting certain disability eligibilities and amounts under their CSRS and FERS programs.	10/20/2021	86 FR 49577	20.5:1
1050 – IRS Earnings of VA Income Dependent Beneficiaries	VA	The Veterans Benefits Administration uses tax return information from SSA's Earnings Recording and Self-Employment Income system of records to update the master records of VA applicants and Beneficiaries.	03/15/2023	88 FR 8048	2.62:1

1051 – Department of Education (DoED) Verification of SSN and Citizenship Status for Financial Aid	DoED	DoED uses SSA information to verify SSNs and confirm citizenship at time of application for financial assistance under Title IV of the Higher Education Act.	10/11/2023	88 FR 62069	24.9:1
1052 – VA Earnings Information	VA	SSA discloses return information to VA to verify earnings data provided directly by medical care applicants.	5/28/2023	88 FR 13516	.267:1 See Section VIII above.
1061 – Housing and Urban Development (HUD) Tenant Reported Income	HUD	Identifies HUD tenants who are ineligible or who have overpaid rental assistance benefits.	4/15/2022	87 FR 14552	59.34:1
1071 – OPM Benefit Data	OPM	OPM uses SSA Title II and Title XVI benefit and earnings data to verify certain FERS retirement or survivors' benefit, eligibility, and payment amounts.	10/27/2021	86 FR 49578	Appendices: A-158:1 B-4,228:1 C-1480:1
1074 – Office of Child Support Enforcement (OCSE) Quarterly SSI Match and Online Query Agreement	OCSE	SSA uses the data from OCSE to verify eligibility and payment amounts for SSI and DI benefits.	8/6/2022	87 FR 39884	3.74:1
1076 – Centers for Medicare and Medicaid Services (CMS) Disclosure of Health Facility Admission Information	CMS	SSA uses CMS data to identify SSI recipients who enter skilled nursing home facilities to adjust, suspend, or terminate SSI payments; and to verify entitlement and benefit amounts, for some World War II veterans under Title VIII.	12/20/2023	88 FR 75636	6.06:1
1094 – CMS Medicare Non-Utilization	CMS	SSA uses CMS data on Medicare enrollees whose records have been inactive for three or more years as an indicator to select and prioritize cases for continued Title II	7/1/2022	87 FR 39576	7.97: 1

		eligibility review.			
1097 – CMS Affordable Care Act (ACA) Enrollment/Eligibility	CMS	SSA discloses information to CMS to administer the Insurance Affordability Program under the Patient Protection and ACA of 2010.	9/9/2022	88 FR 45427	See Section VIII above.
1098 – OCSE Title II National Directory of New Hires Agreement	OCSE	SSA uses OCSE’s quarterly wage and unemployment insurance data to verify eligibility and identify potential overpayments to DI recipients.	6/23/2023	88 FR 15849	15.6:1
1100 – DoED Medical Improvement Not Expected (MINE) Disability Data	DoED	DoED will use SSA MINE information to inform persons with loans and permanent disabilities who may qualify for loan discharges.	9/30/2021	86 FR 47092	75:1
1304 – Fiscal Service Medicare Part D Prescription Drug Subsidy	Department of Treasury	SSA uses Fiscal Service’s ownership of Savings Securities data to verify an applicant’s self-certification of eligibility for prescription drug subsidy assistance.	10/2/2023	88 FR 58431	63.6:1
1305 – IRS Medicare Part D Prescription Drug Subsidy	IRS	SSA uses certain IRS return data to verify an applicant’s self-certification of eligibility for prescription drug subsidy assistance.	11/27/2022	87 FR 61115	2.7:1
1306 – OCSE Medicare Part D Prescription Drug Subsidy	OCSE	SSA uses OCSE quarterly wage, new hire, and unemployment data to verify an applicant’s self-certification of eligibility for prescription drug assistance.	11/26/2022	87 FR 60234	28.3:1

1307 – OPM Medicare Part D Prescription Drug Subsidy	OPM	SSA uses OPM civil service benefit and payment data to verify an applicant’s self-certification of eligibility for prescription drug subsidy assistance.	9/14/2021	86 FR 44464	42:1
1308 – RRB Medicare Part D Prescription Drug Subsidy	RRB	SSA uses RRB annuity payment information to verify an applicant’s self-certification of eligibility for prescription drug subsidy assistance.	9/30/2022	87 FR 51727	43.2:1
1310 – IRS Medicare Parts B & D Premium Subsidy	IRS	SSA uses IRS return information to establish the correct amount of premium subsidy adjustments for Medicare Parts B & D.	4/01/2023	88 FR 9947	17365:1
5001 – Fugitive, Felons, Parole Violators or Probation Violators	Individual Law Enforcement Agencies and Source Jurisdiction	SSA identifies individuals in the Source Jurisdiction who are fleeing fugitive felons, parole violators, or probation violators and who are also SSI recipients, RSDI beneficiaries, SVB beneficiaries, and representative payees for SSI recipients, RSDI beneficiaries, or SVB beneficiaries.	04/10/2022	86 FR 57725	2.51:1
6000 – Model between SSA and the State	States	SSA provides data and SSN verification to States administrating federally funded benefit programs under various provisions of the Social Security Act (Act) including state-funded programs under Title XVI of the Act.	07/01/2022	87 FR 4990	See Section VIII above.

6003 – Model between SSA and the State Agency	State Agency	Provides SSA data and SSN verification to State Agencies administering federally funded benefit programs under various provisions of the Act, including state-funded programs under Title VXi of the Act.	07/01/2022	87 FR 4990	See Section VIII above.
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